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July 14, 2015

**VIA ECF**

Hon. Cathy Seibel  
Charles L. Brieant United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: *The Wave Studio, LLC v. American Express Company*, Case No. 7:15-CV-03420-CS

*The Wave Studio, LLC v General Hotel Management Ltd., et al.*  
Case No. 7:13-CV-9239-CS-PED

Dear Judge Seibel:

I write as counsel for Orbitz Worldwide, LLC (“Orbitz”), one of the defendants in *The Wave Studio, LLC v. General Hotel Management Ltd., et al.*, Case No. 7:13-CV-9239-CS-PED (“GHM litigation”). Currently, the court ordered stay applies to Orbitz in this litigation.

Orbitz is also an interested party in the now consolidated case *The Wave Studio, LLC v. American Express Company*, Case No. 7:15-CV-03420-CS. Orbitz has a contract with American Express to manage two of American Express’s travel websites mentioned in the Wave Studio, LLC (“Wave”) complaint. The contract includes an indemnification clause and Orbitz has agreed to partially indemnify American Express for Wave’s allegations with respect to certain of the images at issue.

Orbitz has reviewed American Express Company’s letter, dated July 2, 2015 to Your Honor regarding American Express Company’s request for a stay. If Wave proceeds in litigation against GHM and American Express, then the same issue of whether Ms. Junior Lee owns the copyrights to certain images in question will be litigated twice. Orbitz is in agreement with American Express’s position on the Motion to Stay.

Very truly yours,

/s/ Sandra B. Saunders

Sandra B. Saunders

cc All parties via ECF